

**TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP**

*Counselors at Law*

3 BECKER FARM ROAD, SUITE 402  
ROSELAND, NEW JERSEY 07068-1726  
Roseland (973) 622-3000  
New York (212) 714-1720

**William H. Trousdale**  
Partner

FAX (973) 623-7780  
[www.tompkinsmcguire.com](http://www.tompkinsmcguire.com)

Direct Line (973) 623-7893  
[wtrousdale@tompkinsmcguire.com](mailto:wtrousdale@tompkinsmcguire.com)

June 9, 2025

Honorable J. Brendan Day, U.S.M.J.  
United States District Court for the District  
of New Jersey  
Clarkson S. Fisher Federal Building & U.S.  
Courthouse  
402 East State Street  
Trenton, New Jersey 08608

Re: *In re Effexor XR Antitrust Litigation*, No. 11-5479 (ZNQ/JBD)

Dear Judge Day:

Pursuant to Your Honor's May 21, 2025 text order (ECF No. 817), Teva submits this letter to apprise the Court of the status of Caremark's production of claims data in this litigation.

On June 4, 2025, Caremark served a production of claims data. However, upon receipt and review, Teva discovered that Caremark produced such data in files that contained several technical errors, preventing the files from being accessed. Teva's counsel, on the evening of June 4, promptly notified Caremark's counsel of the technical errors. On June 5, Teva's counsel, again, emailed Caremark's counsel, inquiring about the technical errors. In response, Caremark's counsel represented that she is "trying to get the correct data [as soon as possible]." On June 6, Teva's counsel requested that Caremark's counsel provide an update on the status of Caremark's reproduction of claims data. Teva's counsel has not yet received a response, and continues to follow up regularly with counsel for Caremark.

Teva's counsel will continue to press Caremark's counsel for updates on the status of the production. Based on Caremark counsel's representations, Teva remains hopeful that Caremark will reproduce the claims data in a timely fashion.

Respectfully yours,  
/s/William H. Trousdale  
William H. Trousdale  
For TOMPKINS, McGUIRE, WACHENFELD & BARRY

cc. All counsel of record via ECF